

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 05-98-GMS
)	
DEONDRE BOYER,)	
)	
Defendant.)	

JOINT REQUEST FOR SPECIAL VOIR DIRE

The parties to the above case submit the following request for special voir dire:

GOVERNMENT'S REQUESTS

1. Do you know (witness list to be applied)?
2. This case involves a charge of possession of a firearm and ammunition by a felon. Is there anything about the nature of the charge that would prevent you from being an impartial juror?
3. Do you object to a law which prohibits people convicted of certain crimes from possessing a firearm or ammunition, even after they have completed their sentence?
4. Are you a member of any organization which supports or opposes federal or state gun control laws?
5. Do you think the police should spend less time investigating gun and firearms cases than they do?

6. Have you, your spouse, a relative or close friend, ever been the victim of gun violence or a crime that involved the use of a firearm?

7. Have you, your spouse, a relative or close friend ever been charged with a crime involving the possession or use of a firearm?

8. Would the fact that the ATF and the New Castle County Police Department are the investigating and/or participating agencies in this case interfere with you ability to be fair and impartial?

9. Have you served on a jury for a criminal case before?

10. Have you been arrested for anything (other than a minor traffic offense)?

11. Have you ever testified in a criminal case?

DEFENSE REQUESTS

1. Have you, your spouse, a relative or close friend ever been employed by or associated with any law enforcement agency on either a Federal, State or local level?

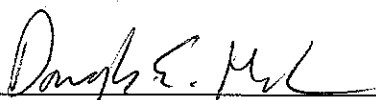
2. Would you give greater testimony to the sworn testimony of a police officer than you would the sworn testimony of a civilian witness solely because he or she is a police officer?

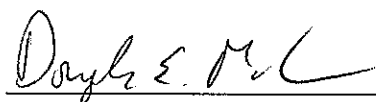
3. Do you believe that the word of someone who has been convicted of a felony cannot,

under any circumstances, be accepted as true?

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: 
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Attorney for Defendant Boyer

Dated: March 28, 2006

CERTIFICATE OF SERVICE

I, Douglas E. McCann hereby certify that on March 28, 2006, the foregoing **JOINT REQUEST FOR VOIR DIRE** was served, as indicated, upon

BY HAND

Joe Hurley, Esquire
1215 King Street
Wilmington, DE 19801
(302) 658-8980



Douglas E. McCann